Revised 12/03

CORRES. CONTROL
INCOMING LTR NO.

00342 RF04

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J.H.	X	X
BOGNAR, E.S.	X	X
BROOKS, L.	X	X
BUTLER, L.	X	X
CARPENTER, M.	X	X
CROCKETT, G. A.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DIETER, T. J.		
FERRERA, D. W.	X	X
GIACOMINI, J. J.		
LINDSAY, D. C.	X	X
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NESTA, S.		
NORTH, K.	X	X
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
PIZZUTO, V.M.		
TUOR, N. R.	X	X
WIEMELT, K.	X	X
WILLIAMS, J. L.		
ZAHM, C.	X	X
COR. CONTROL	X	X
ADMIN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres. Control RFP

8/26/04 DC
Date By

Ref. Ltr. #

DOE ORDER #
5400.1

RECEIVED
2004 AUG 26 A 9:08
CORRESPONDENCE CONTROL

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
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TDD Line (303) 691-7700
Located in Glendale, Colorado

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

August 23, 2004

Mr. Joseph Legare
Director, Project Management Division
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: APPROVAL, DATA SUMMARY REPORT FOR IHSS GROUP 400-1, UBC-439 – RADIOLOGICAL SURVEY

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the subject report and, as a consequence, No Further Accelerated Action (NFAA) for IHSS Group 400-1. A comment resolution meeting on August 17, 2004, and subsequent revisions submitted electronically, was successful in resolving the Division's comments. Our comments are attached for reference.

Data from beneath the building support the NFAA determination. However, from our comments, we reiterate that any UBC contamination that may have resulted from IHSS 400-157.2 may necessitate a removal action.

We look forward to confirming that changes are reflected in the final document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337, or David Kruchek at 303-692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc: Mark Aguilar, EPA
Larry Kimmel, EPA
Dave Shelton, KH
Administrative Records, Building 130K

Mark Sattelberg, U.S.F&W
Norma Castaneda, DOE
Lane Butler, KH

RECEIVED
AUG 2 6 2004

ADMIN RECORD

H:\RFETS\400-1 IHSS Group DSR Approval.doc

IA-A-002266

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2

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft
Data Summary Report
for
IHSS Group 400-1
UBC-439, Radiological Survey

August 2004

General Comment:

1. It should be understood that an NFAA for this IHSS does not relieve the requirement for removal of contamination from the area under B439 slab (within this IHSS boundary) if contamination is found in IHSS 400-157.2 that may extend under B439.

Specific Comments:

2. Section 2.0: Section 2.1 notes that no previous characterization of soil, beneath Building 439, had been conducted. For clarity, the third paragraph of Section 2.0 should note that the "previously collected analytical data" was outside the building's footprint.

3. Table 1: Delete "examine" from the "Comments/Deviations" column for the first location, i.e. BX35-028.

4. Section 2.4: "RL" should be deleted from the discussion that includes radionuclides as the only COCs.

5. Section 4.0: In the absence of plutonium or americium it should be clarified that this SSRS is relative to COCs greater than 0.5 feet in depth.

6. Screens 2 and 3 are not applicable since Screen 1 showed no exceedances of the WRWs. (The approach of including or excluding Screens 2 and 3, when WRWs have not been exceeded, has been inconsistent from document to document.)

7. Screen 2 - Although as previously commented this screen is not necessary, this screen also needs to take into consideration the potential surface land reconfiguration that might be performed, which may remove some surface soil, thereby causing the subsurface soil to become surface soil.

8. Screen 4: Once again, the "sufficient quantity of COCs" portion of Screen 4 has not been addressed. Rather than provide indirect evidence from surface water monitoring stations and ground water wells, it would be more direct to state, and when appropriate demonstrate, that COCs are insufficient to impact surface waters.

9. Section 5.0: 2nd Bullet - Since contaminant concentrations were below the WRW ALs this discussion seems unnecessary, but if included it should include a discussion of possible land reconfiguration which could cause instant erosion (removal and spreading) of the surface soil.

10. Table 7: Table 7 does not indicate that "LCS analyses were run for all methods except for gamma spectroscopy." Either add gamma as a test method and list "No" in the LCS column or delete the reference to what Table 7 shows.

11. Section 6.2.2: Under Field Duplicate Evaluation, page 23, last paragraph, please clarify the application of the "five times" factor in this context. The factor is commonly applied to detections in blanks.

12. Section 6.2.3: The rationale used in the DSR for 600-5, etc., i.e. that the samples were run, and bound, in the laboratory by other samples that maintained quality requirements, should be included.

2